

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ROGER DUANE ORTEGO AND  
BRYAN F. GILL, JR., AS TRUSTEE  
OF THE BANKRUPTCY ESTATE OF  
ROGER DUANE ORTEGO

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CIVIL ACTION NO.: 07-CIV-9641

JUDGE HAIGHT

VERSUS

MORAN TOWING CORPORATION

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MOTION TO ADMIT COUNSEL PRO HAC VICE

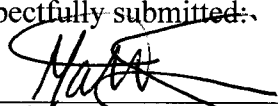
PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, **MATTHEW SAKKAS**, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

**RALEIGH NEWMAN**  
RALEIGH NEWMAN, APLC  
1830 Hodges Street  
Lake Charles, Louisiana 70601  
Telephone: (337) 439-5788  
Telecopier: (337) 436-5430

**RALEIGH NEWMAN** is a member in good standing of the Bar of the State of Louisiana. There are no pending disciplinary proceedings pending against **RALEIGH NEWMAN** in any State or Federal Court.

New York City, New York, this 24<sup>th</sup> day of January, 2008.

Respectfully submitted:

  
MATTHEW SAKKAS, Esq.  
SDNY Bar Code: WMS3351

FILED  
U.S. DISTRICT COURT  
S.D. OF N.Y.  
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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

ROGER DUANE ORTEGO AND \* CIVIL ACTION NO.: 07-CIV-9641  
BRYAN F. GILL, JR., AS TRUSTEE \*  
OF THE BANKRUPTCY ESTATE OF \* JUDGE HAIGHT  
ROGER DUANE ORTEGO \*

VERSUS

MORAN TOWING CORPORATION \*

\*\*\*\*\*

**AFFIDAVIT OF MATTHEW SAKKAS**  
**IN SUPPORT OF MOTION TO ADMIT**  
**COUNSEL PRO HAC VICE**

STATE OF NEW YORK

COUNTY OF MANHATTAN

MATTHEW SAKKAS, being duly sworn, hereby deposes and says as follows:

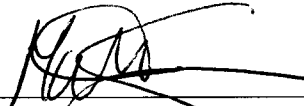
1. I am Of Counsel at Sakkas & Cahn, LLP, counsel for Plaintiffs in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiffs' motion to admit Raleigh Newman as counsel pro hac vice to represent Plaintiffs in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 1992. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Raleigh Newman since 2007.
4. Mr. Newman is Of Counsel at Raleigh Newman, APLC, in Lake Charles, Louisiana.
5. I have found Mr. Newman to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
6. Accordingly, I am pleased to move the admission of Raleigh Newman, pro hac vice.
7. I respectfully submit a proposed order granting the admission of Raleigh Newman, pro hac

vice, which is attached hereto as Exhibit A.

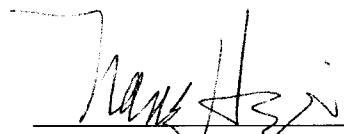
WHEREFORE, it is respectfully requested that the motion to admit Raleigh Newman, pro hac vice, to represent Plaintiffs in the above captioned matter, be granted.

New York, New York, this 24<sup>th</sup> day of January, 2008.

Respectfully submitted:

  
\_\_\_\_\_  
MATTHEW SAKKAS, Esq.  
SDNY Bar Code: WMS3351

THUS DONE AND SIGNED, before me, the undersigned authority, this 24<sup>th</sup> day of  
January, 2008.

  
\_\_\_\_\_  
NOTARY PUBLIC

NANCY HIGER  
Notary Public, State of New York  
No. 31-4554724  
City of New York County  
Commission expires January 13, 2010

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

<b>ROGER DUANE ORTEGO AND BRYAN F. GILL, JR., AS TRUSTEE OF THE BANKRUPTCY ESTATE OF ROGER DUANE ORTEGO</b>	* * * * * * * * *	<b>CIVIL ACTION NO.: 07-CIV-9641  JUDGE HAIGHT</b>
<b>VERSUS</b>	* *	
<b>MORAN TOWING CORPORATION</b>	*	
<b>*****</b>		

**ORDER**

Upon the motion of MATTHEW SAKKAS, ESQ., attorney for Plaintiffs, Roger Duane Ortego and Bryan F. Gill, Jr., as Trustee of the Bankruptcy Estate of Roger Duane Ortego, and said sponsor attorney's affidavit in support;

**IT IS HEREBY ORDERED** that

**RALEIGH NEWMAN**  
RALEIGH NEWMAN, APLC  
1830 Hodges Street  
Lake Charles, Louisiana 70601  
Telephone: (337) 439-5788  
Telecopier: (337) 436-5430  
Email: [raleigh@raleighnewman.com](mailto:raleigh@raleighnewman.com)

is admitted to practice pro hac vice as counsel for Roger Duane Ortego and Bryan F. Gill, Jr., as Trustee of the Bankruptcy Estate of Roger Duane Ortego in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall

immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the pro hac vice fee to the Clerk of Court.

THUS DONE AND SIGNED, in Chambers, this \_\_\_\_ day of \_\_\_\_\_, 2008, at New York, New York.

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JUDGE - UNITED STATES DISTRICT COURT

**AFFIRMATION OF SERVICE**

MATTHEW SAKKAS, an attorney duly admitted to practice law before this Court, affirms to the truth of the following under penalty of perjury:

I am not a party to this action, I am over 18 years of age and I reside in New York, New York. On January 24, 2008 I mailed a copy of the within ***NOTICE OF MOTION TO ADMIT COUNSEL PRO HAC VICE*** and ***AFFIDAVIT OF MATTHEW SAKKAS IN SUPPORT OF MOTION TO ADMIT COUNSEL PRO HAC VICE*** and ***ORDER*** to the persons or firms listed below at the following addresses:

Profeta & Eisenstein  
Attorneys for Defendants  
14 Wall Street, 22nd Floor  
New York, NY 10005-2101

by enclosing a copy of same in a postpaid properly addressed envelope and depositing said envelope in an official depository under the exclusive care and custody of the U.S. Postal Service within New York State.

Dated: New York, New York  
January 24, 2008

S A K K A S   &   C A H N ,   L L P

By: \_\_\_\_\_



MATTHEW SAKKAS, ESQ.  
Attorney for Plaintiffs  
150 Broadway, Suite 1307  
New York, N.Y. 10038  
Tel: (212)693-1313  
Fax: (212)693-1314

United States of America

State of Louisiana

**Supreme Court of the State of Louisiana**

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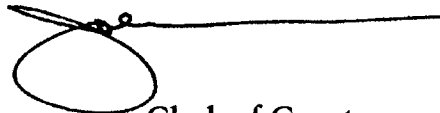
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I, JOHN TARLTON OLIVIER, Clerk of the Supreme Court of the State of Louisiana, do hereby certify that

**RALEIGH NEWMAN, ESQ., #7569**

was duly admitted and licensed to practice as an attorney and counselor at law in this Court and the several courts of the State of Louisiana, on the 31st Day of August, 1967 A.D.; and is currently in good standing, and sufficiently qualified to perform the duties of an attorney and counselor at law.

IN WITNESS WHEREOF, I hereunto sign  
my name and affix the seal of this Court,  
at the City of New Orleans, this the 25th  
Day of January, 2008, A.D.

A handwritten signature in black ink, appearing to read "John Tarlton Olivier", is written over a horizontal line. The signature is stylized with a large, looped initial "J".

Clerk of Court  
Supreme Court of Louisiana